

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ALLSTATE INSURANCE COMPANY, as
successor in interest to NORTHBROOK EXCESS
AND SURPLUS INSURANCE COMPANY f/k/a
NORTHBROOK INSURANCE COMPANY,

Plaintiff,

v.

TRANSATLANTIC REINSURANCE COMPANY,

Defendant.

Case No.: 08 CV 4173

Judge: Robert Dow

**AGREED MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant Transatlantic Reinsurance Company (“Transatlantic Re”), by and through its attorneys, Litchfield Cavo LLP, moves this Honorable Court for an extension of time to answer or otherwise plead. In support thereof, Transatlantic Re respectfully states as follows:

1. Plaintiff Allstate Insurance Company, as successor in interest to Northbrook Excess and Surplus Insurance Company f/k/a Northbrook Insurance Company (“Allstate”) is a business that was incorporated in and has its principal place of business in Illinois.

2. Transatlantic Re is a business incorporated in and having its principal place of business in New York.

3. On June 23, 2008, Allstate filed a complaint for declaratory judgment in the Circuit Court of Cook County, Illinois (case no. 08 CH 20186). Transatlantic Re has not yet responded to the Complaint nor have any rulings been made on this case.

4. Transatlantic Re removed this lawsuit to this Court on July 23, 2008.

5. Transatlantic Re requests an additional 14 days, to and including August 13, 2008, to ANSWER, MOVE, or otherwise RESPOND to the Complaint

6. Counsel for Allstate has been consulted and has no objection to this motion.

WHEREFORE, Defendant Transatlantic Reinsurance Company hereby moves this Honorable Court for an extension of time to answer, move or otherwise respond to the Complaint until August 13, 2008.

Dated: July 25, 2008

/s/ Hope G. Nightingale

By: An Attorney for Defendant

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